## REMARKS

In the Office Action[1], the Examiner rejected claims 1-3, 7-9, and 13-15 under

35 U.S.C. §102(b) as being anticipated by "Windows XP in a Nutshell" to Karp et al.

("*Karp*"); and rejected claims 4-6 and 10-12 under 35 U.S.C. §102(b) as being

anticipated by "Microsoft Excel 2002 Version 3.0.6926 SP-3" ("*Excel*").

Applicants have amended claims 1, 4, 7, 10, and 13. Claims 1-15 remain

pending.

### I. Regarding the rejections of claims 1-3, 7-9, and 13-15 under 35 U.S.C. §102(b) as being anticipated by *Karp*

Applicants respectfully traverse the rejection of claims 1-3, 7-9, and 13-15 under

35 U.S.C. § 102(b) as anticipated by *Karp*. In order to properly establish that *Karp*

anticipates Applicants' claimed invention under 35 U.S.C. § 102, each and every

element of each of the claims in issue must be found, either expressly described or

under principles of inherency, in that single reference. Furthermore, "[t]he identical

invention must be shown in as complete detail as is contained in the ... claim." *See*

M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9

U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). *Karp* does not anticipate the claims at least

because it fails to teach each and every element of the claims.

Claim 1 recites a method including, for example:

> detecting a navigation key press of <u>a sibling navigation key having
> a first group identifier and a parent navigation key having a second group
> identifier</u>, and if the navigation key is the sibling navigation key, shifting
> input focus to a next sibling group in the hierarchy, and if the navigation

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[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

key is the parent navigation key, shifting input focus to a parent group in the hierarchy.

(emphasis added). *Karp* does not disclose at least these elements of claim 1.

*Karp* discloses an appendix list of keyboard shortcuts. The key combinations cited by the Examiner (i.e. Alt-Tab{+Tab} and Alt-x) are key combinations to perform a desired action. However, there is no teaching or suggestion in *Karp* that these combinations have a "group identifier." For example, fig. 2 and 3 depict a parent navigation control keystroke and keyboard navigation shortcuts to select parent and child nodes. However, any navigation key that may exist in Fig. 2 of *Karp* constitutes a keystroke, such as the left or right arrow key. These keys are used to navigate the applications running on the operating system. Such keys present on a keyboard do not teach the "group identifier," recited in claim 1.

Furthermore, fig. 3 states that the user "can use the tab control to tab through the child nodes of a parent or the user can use the left and right arrow keys to tab through parent nodes and up and down arrow keys to tab through child nodes." Even assuming that a user input to select the desired parent node (i.e. Tools) could constitute the claimed "parent navigation key having a group identifier," which Applicants do not concede, the user input to navigate the child nodes is an up and/or down arrow (Fig. 3). However, an up and down arrow contains no identity of a "group." Therefore, *Karp* does not teach or suggest the claimed "detecting a navigation key press of <u>a sibling navigation key having a first group identifier and a parent navigation key having a second group identifier</u>," as recited in claim 1.

*Karp* fails to teach at least the above elements and, accordingly, *Karp* cannot

anticipate claim 1. Thus, claim 1 is allowable for at least these reasons. Claims 2 and 3

are also allowable at least due to their depending from claim 1.

Independent claims 7 and 13, while of different scope from claim 1 and each

other, recite elements similar to those of claim 1 and, thus, are allowable over *Karp* for

at least the same reasons discussed above in regard to claim 1. Claims 8-9 and 14-15

are also allowable at least due to their depending from claims 7 and 13, respectively.

## II. Regarding the rejections of claims 4-6 and 10-12 under 35 U.S.C. §102(b) as being anticipated by *Excel*

Applicants respectfully traverse the rejection of claims 4-6 and 10-12 under

35 U.S.C. § 102(b) as anticipated by *Excel*.

Claim 4 recites a method including, for example:

> detecting a navigation key press of a <u>forward navigation key having</u>
> <u>a first group identifier or a backward navigation key having a second group</u>
> <u>identifier</u>;

(emphasis added). *Excel* does not disclose at least these elements of claim 4.

*Excel* discloses a parent node and child node associated with the parent node

(Fig. 2). The user may arrow into editable cells, forward and backward navigate through

the cells (Fig. 3), and lock a cell (Fig. 4). Any navigation key press that may exist in

*Excel* is an arrow key, the Tab key, or the Shift-Tab (Fig. 3). These keys are used to

navigate through cells, but they do not identify a "group." Therefore, *Excel* does not

teach or suggest the claimed "detecting a navigation key press of a <u>forward navigation</u>

<u>key having a first group identifier or a backward navigation key having a second group</u>

<u>identifier</u>," as recited in claim 4.

*Excel* fails to teach at least the above elements and, accordingly, *Excel* cannot anticipate claim 4. Thus, claim 4 is allowable for at least these reasons. Claims 5 and 6 are also allowable at least due to their depending from claim 4.

Independent claim 10, while of different scope, recites limitations similar to those of claim 4 and, thus, is allowable over *Excel* for at least the same reasons discussed above in regard to claim 4. Claims 11 and 12 are also allowable at least due to their depending from claim 10.

### III. Conclusion

In view of the foregoing remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

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By: Jeffrey A. Berkowitz
Reg. No. 36,743

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